

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SONTERRA CAPITAL MASTER FUND LTD.,  
FRONTPOINT EUROPEAN FUND, L.P.,  
FRONTPOINT FINANCIAL SERVICES FUND,  
L.P., FRONTPOINT HEALTHCARE FLAGSHIP  
ENHANCED FUND, L.P., FRONTPOINT  
HEALTHCARE FLAGSHIP FUND, L.P.,  
FRONTPOINT HEALTHCARE HORIZONS  
FUND, L.P., FRONTPOINT FINANCIAL  
HORIZONS FUND, L.P., FRONTPOINT UTILITY  
AND ENERGY FUND L.P., HUNTER GLOBAL  
INVESTORS FUND I, L.P., HUNTER GLOBAL  
INVESTORS OFFSHORE FUND LTD., HUNTER  
GLOBAL INVESTORS SRI FUND LTD., HG  
HOLDINGS LTD., HG HOLDINGS II LTD.,  
FRANK DIVITTO, RICHARD DENNIS and the  
CALIFORNIA STATE TEACHERS'  
RETIREMENT SYSTEM on behalf of themselves  
and all others similarly situated,

Plaintiffs,

- against -

CREDIT SUISSE GROUP AG, CREDIT SUISSE AG,  
JPMORGAN CHASE & CO., THE ROYAL BANK  
OF SCOTLAND PLC, UBS AG, DEUTSCHE BANK  
AG, DB GROUP SERVICES UK LIMITED, TP ICAP  
PLC, TULLETT PREBON AMERICAS CORP.,  
TULLETT PREBON (USA) INC., TULLETT PREBON  
FINANCIAL SERVICES LLC, TULLETT PREBON  
(EUROPE) LIMITED, COSMOREX AG, ICAP  
EUROPE LIMITED, ICAP SECURITIES (USA)  
LIMITED, NEX GROUP PLC, INTERCAPITAL  
CAPITAL MARKETS LLC, GOTTEX BROKERS  
SA, VELCOR SA AND JOHN DOE NOS. 1-50,

Defendants.

Docket No. 15-cv-0871 (SHS)

**ORAL ARGUMENT REQUESTED**

**NOTICE OF DEFENDANTS'  
MOTIONS TO DISMISS THE  
SECOND AMENDED CLASS  
ACTION COMPLAINT**

**NOTICE OF DEFENDANTS' MOTIONS TO  
DISMISS THE SECOND AMENDED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that the undersigned, attorneys for Defendants Credit Suisse AG, Credit Suisse Group AG, Deutsche Bank AG, DB Group Services (UK) Limited, The Royal Bank of Scotland plc, and UBS AG (collectively, "Original Defendants") in the above referenced matter, request oral argument and will move this Court, before the Honorable Sidney H. Stein, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by this Court, for an order pursuant to Rules 12(b)(1), 12(b)(2), 12(b)(3), and 12(b)(6) of the Federal Rules of Civil Procedure dismissing with prejudice, in whole or in part, the claims asserted in the Second Amended Class Action Complaint.

The grounds for these motions are that the Second Amended Complaint should be dismissed, as to all Original Defendants, for lack of personal jurisdiction, as to Credit Suisse Group AG and DB Group Services (UK) Limited because of lack of venue, and, as to all Original Defendants, because it fails to state a claim upon which relief can be granted and the Court lacks subject matter jurisdiction over the claims asserted. The specific grounds are set forth in two memoranda: (1) the Memorandum of Law in Support of Defendants' Motion to Dismiss the Second Amended Class Action Complaint for Lack of Subject Matter Jurisdiction and Failure to State a Claim and the accompanying Declaration of Joel Kurtzberg, dated February 7, 2018, and exhibits thereto; and (2) the Memorandum of Law in Support of Foreign Defendants' Motion to Dismiss the Second Amended Class Action Complaint for Lack of Personal Jurisdiction and the accompanying Declaration of Joel Kurtzberg, dated February 7, 2018, and exhibits thereto.

Dated: February 7, 2018  
New York, New York

Respectfully Submitted,

/s/ Mark A. Kirsch

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